

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**AT CHARLESTON**

**UNITED STATES OF AMERICA,**

**v.**

**Case No. 2:20-cr-00054**

**NEDELTCHO VLADIMIROV,**

**Defendant.**

**NOTICE OF RULE 609 OF THE FEDERAL RULES OF EVIDENCE**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and advises the United States that the Defendant intends to introduce evidence of prior crimes of dishonesty older than ten (10) years disclosed to the Defendant by the United States applicable to the United States' fact witnesses to the extent that they deal with crimes of dishonesty. An example of this would be Steven Andersons' post office burglary which occurred in 2001.

**THEREFORE**, the Defendant Nedeltcho Vladimirov places the United States on notice.

**NEDELTCHO VLADIMIROV**

**By Counsel,**

**CICCARELLO, DEL GIUDICE & LAFON**

By: /s/Timothy J. LaFon  
Timothy J. LaFon (WV #2123)  
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Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I, Timothy J. LaFon, do hereby certify that the foregoing “**Notice of Rule 609 of the Federal Rules of Evidence**” has been served upon all parties via the Court’s electronic filing system on the 14<sup>th</sup> day of July, 2021:

Andrew Tessman, Esquire  
United States Attorney’s Office  
P.O. Box 1713  
Charleston, West Virginia 25326

**CICCARELLO, DEL GIUDICE & LAFON**

By: /s/Timothy J. LaFon  
Timothy J. LaFon (WV #2123)  
Attorney for Defendant